



VMV Paducahbilt

1300 Kentucky Avenue
Paducah, Kentucky 42003-1979

EPPC - Division of Water KPDES

KPDES Permit # KY0003271

Dear Mr. Sartipi,

Per our 2008 agreement with the Permit Branch, NRE Acquisitions Co LLC (dba VMV Paducahbilt) respectfully submits twelve (12) months of sample data to be used as basis for formula corrections. In lieu of using the default assumption of 100 mg/L CaCO₃ for Hardness, we submit that the 12 month average should be 231 mg/L. This data was collected at the outfall during monthly sampling for the DMR and is listed on the attached tables.

With that said, NRE request this hardness average correction be utilized to also correct the total lead average limit value. We submit that the corrected monthly total lead average limit should be approximately 9.2650 ug/L based on the actual hardness average of 231 mg/L.

It is our belief that since the permit went into effect with the total lead limit of 3.515 ug/L using the default 100 mg/L CaCO₃ for hardness, that we have been in compliance with the intent of the permit using actual data as obtained over the past year. Therefore, any DMR total lead average limit exceedance that was noted above the 3.515 ug/L (default value) should be reconciled with the corrected limit based on actual data calculations (~9.2650 ug/L mo avg).

NRE Acquisition Co LLC (dba VMV Paducahbilt) respectfully requests the Permit Branch to open this permit for correction as described to recalculate the total recoverable lead monthly average limit using actual hardness data vs. any assumptions made. Furthermore, we are willing to add hardness to our monthly sampling plan for the DMR in order to build a long-term database for future permit calculations if the Division desires.

I look forward to hearing from you Mr. Sartipi, thank you!

Respectfully,

Kent Hall
Director – QA, EHS
VMV Paducahbilt

Attachments: Table 1 and 2 Correction Calculations



(270) 444-4555 800-444-8683 Fax (270) 444-4550 www.paducahbilt.com

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	RECALCULATED AVG LEAD LIMIT BASED ON ACTUAL HARDNESS		DMR ACTUAL RESULTS	
	HARDNESS	TOTAL LEAD	TOTAL LEAD	
	CaCO3 mg/L	Pb ug/L	DMR MO AVG	HIGHEST MO SAMPLE (MAX)
2008				
APRIL	186	7.0103	2.100	2.100
MAY	260	10.7376	6.335	10.800
JUNE	329	14.4889	8.458	13.500
JULY	220	8.6806	4.513	4.230
AUG	195	7.4449	2.030	2.030
SEPT	203	7.8359	6.030	9.320
OCT	232	9.2878	1.590	1.590
NOV	220	8.6806	5.980	8.780
DEC	210	8.1814	8.170	10.300
2009				
JAN	271	11.3192	7.420	11.300
FEB	218	8.5802	9.210	15.600
MAR	225	8.9325	8.587	20.400

RUNNING

EST AVG

231	9.2650
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5.8686	9.1625
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DEFAULT ASSUMPTION

PERMIT USES	100	3.5150
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4/7/2009

Table 2 - Detailed